

# **EXHIBIT A**

**DECLARATION OF ZHUO ZHONGGEN**

ZHUO ZHONGGEN states as follows:

1. I am an employee of Shanghai Fareast International Shipping Agency Co. Ltd. ("Shanghai Agency"). I was the person at Shanghai Agency which dealt with the M/V BRAVE JOHN's call at Shanghai, China in August, 2007.

2. On August 7, 2007, Shanghai Agency was appointed to act as the port agent on behalf of Yong He Shipping (HK) Ltd. ("Yong He"). This appointment came via Yong He's managing agent, Old Eastern Mediterranean Co. SA ("OEM"). Attached as Exhibit "1" is a copy of this appointment.

3. Shanghai Agency received a copy of the charter party for the M/V BRAVE JOHN between Oresteia Shipping Ltd., as owner, and Yong He, as charterer. This is attached as Exhibit "2".

4. All the bills of lading respecting the various shipments at the Port of Shanghai were drafted by the Forwarders respectively, and provided to us together with mate's receipt and shipping orders for our issuance. Upon receipt of the above documents, we relayed them to Yong He via OEM for their confirmation and instruction. At various times, Yong He authorized Shanghai Agency to issue these bills of lading to the shippers. Attached as Exhibit "3" are such authorities.

5. Some of the bills of lading were marked "freight prepaid" and some were marked "freight collateral" or similar such words. These markings were in accordance with the same markings on the Mates' receipts signed by the vessel for the various



"A"

shipments. Attached are copies of the freight prepaid (Exhibit "4A" and freight collect (Exhibit "4B") bills of lading and corresponding Mates' receipts.

6. On August 22 the Master of the M/V BRAVE JOHN handed me a letter respecting issuance of the bills of lading. Since Shanghai Agency had been appointed by Yong He and not the vessel's owners, I and Shanghai Agency did not agree to the terms of this letter and we did not consider that we were bound by this. I therefore signed with the notation "RCVD THIS LETTER". Attached as Exhibit "5" is a copy of this letter.

7. The vessel loaded cargo on the dates indicated in shipping orders. Attached as Exhibit "6" are copies of the shipping orders, which were consistent with the Mates' receipts completely.

8. The BRAVE JOHN completed loading at Shanghai on August 22, 2007 and sailed from Shanghai on that date.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed: Shanghai, China  
January 28, 2008

ZHUO ZHONGGEN